

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

Sarah Zehr, et al. v. Zhejiang Huahai

Pharmaceutical Co., Ltd., et al.

Case No. 1:19-cv-12935

NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF SARAH ZEHR

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendant Hetero Drugs Ltd. And Hetero Labs Ltd. will take the deposition upon oral examination of Sarah Zehr on March 24, 2021 at 9:00 a.m. EST at Hill Wallack LLP, 21 Roszel Road, Princeton, NJ 08540. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Eric Abraham, Esq.
Hill Wallack LLP
21 Roszel Road

Princeton, NJ 08540
(609) 924-0808
eabraham@hillwallack.com

Instructions for Videographer for Web Deposition:

When a document is being shared on the screen as an exhibit, the videographer must have a split screen with a pinned video of the deponent and the exhibit.

Rules for Web Deposition:

1. During the deposition the witness shall not communicate (orally, by chat room, email, text, etc.) with any person other than the attorney asking the questions;
2. All persons in the room with the witness during the deposition must have Zoom video capabilities and must have the video camera directed toward them at all times during the deposition proceedings;
3. The witness shall neither read nor respond to any communication made to the witness from inside or outside the deposition location during the deposition except as to documents presented by the questioning attorney during the deposition;
4. There is to be no communication – verbal or non-verbal – during the deposition by anyone other than the questioning attorney (or the attorney presenting the witness for an instruction not to answer a question regarding a privileged matter);
5. No attorney or other person present in the room or outside of the room where the witness is presented is to use any communication intended to coach the witness;
6. The witness shall not use any device (cell phone, laptops, etc.) during the deposition other than the computer used for Zoom access unless specifically

- requested by the questioning attorney during the normal course of the proceedings;
7. There shall be no private chats during the deposition (the court reporter or other administrator of the proceedings shall make certain the chat function of the Zoom feature is disabled); and
 8. “Zoom” includes the Zoom application or any similar software application intended to allow deposition proceedings to proceed electronically whether by audio, video, or both.

To the extent not previously produced, the deponent shall produce any document reviewed by the deponent, seven (7) days prior to the commencement of the deposition, to prepare for the deposition and/or to refresh the deponent’s recollection regarding the facts of the case.

Date: February 19, 2021

Respectfully submitted,

/s/ Eric Abraham

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*Attorney for Defendant Hetero Labs Ltd. And
Hetero Drugs Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of February, 2021 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff Sarah Zehr was served upon the following via ECF, with copies to Counsel for Plaintiffs and all counsel of record by e-mail:

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/s/ Eric Abraham
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